

December 5, 2014

Richard D. Olson, MD, MPH  
Prevention Science Lead and Designated Federal Officer, 2015 DGAC  
Office of Disease Prevention and Health Promotion, OASH  
U.S. Department of Health and Human Services  
1101 Wootton Parkway, Suite LL100 Tower Building  
Rockville, MD 20852



Colette I. Rihane, MS, RD  
Director, Nutrition Guidance and Analysis Division  
Center for Nutrition Policy and Promotion  
U.S. Department of Agriculture  
3101 Park Center Drive, Room 1034  
Alexandria, VA 22302

Cc: 2015 DGAC Added Sugars Working Group

RE: IFIC Foundation Consumer Research on the Nutrition Facts Panel and Sugars Labeling

Dear Dr. Olson and Ms. Rihane,

The International Food Information Council (IFIC) Foundation appreciates the opportunity to submit comments to the 2015 Dietary Guidelines Advisory Committee (DGAC). The IFIC Foundation is a nonprofit organization with a mission to effectively communicate science-based information about health, nutrition, and food safety for the public good.

One of the objectives at the Foundation is understanding public perceptions by conducting consumer research. It is the belief of the Foundation that consumer research is a critical first step in determining Americans' understanding of nutrition information and examining how consumer knowledge, perceptions and attitudes may impact behavior.

During the most recent meeting of the 2015 DGAC (Meeting 6 on November 7, 2014), the Added Sugars Working Group presented the following Draft Implications Statement:

"The Nutrition Facts Panel should include added sugars (in grams and teaspoons) and include a percent daily value in order to assist consumers in identifying the amount of added sugars in foods and beverages to help them in making informed decisions."

The FDA has proposed [updating the NFP](#) to include, among other things, "Added Sugars" information. In the [Federal Register published on Monday, March 3, 2014](#), FDA stated an intent to address "how a declaration of 'Added Sugars' and alternative footnote statement may influence consumer use of the label" and are currently conducting [consumer research](#) entitled, "FDA Experimental Study on Consumer Responses to Nutrition Facts Labels with Various Footnote Formats and Declaration of Amount of Added Sugars." FDA's consumer research, however, is not yet publicly available.

According to the description of duties in the charter, the DGAC will “take into consideration new scientific evidence and current resource documents, and then develop a report to be submitted to the Secretaries that outlines its science-based recommendations and rationale which will serve as a basis for developing the eighth edition of Dietary Guidelines for Americans.”

With a commitment to providing high-quality and relevant consumer research, the Foundation has recently completed a two-phase (qualitative and quantitative) research project on how consumers use and understand the NFP and how an “Added Sugars” declaration may be perceived among consumers. To assist the 2015 DGAC in preparing their final conclusions regarding FDA’s proposal to include “Added Sugars” on the NFP, we are excited to share our preliminary findings within these written comments. We believe our results will be of keen interest to the DGAC as they near submission of their final 2015 report.

Our preliminary findings demonstrate the need for FDA (and other authoritative bodies such as the 2015 DGAC) to more broadly consider the implications of consumer research, specifically on the proposed inclusion of “Added Sugars” to the NFP. IFIC Foundation will be submitting our research results to a peer-reviewed journal for publication.

### **Consumer Research Designs: IFIC Foundation’s compared to FDA’s**

The Foundation’s quantitative research (a national online survey among adult consumers) followed a different design than that of FDA. Our sample (n = 1,088) was balanced to the U.S. census profile on census region, gender, age, race and Hispanic national origin. Our survey was a monadic design with three independent cells each cell balanced based on the same U.S. Census profiles listed above.

As previously mentioned, FDA is conducting their own consumer study. Before the DGAC reviews our findings below, should DGAC members be familiar with FDA’s consumer study, we’d like to note key differences and similarities (based on FDA information [available online here](#)) that we’ve observed between the Foundation’s consumer research design and the ongoing FDA study.

#### ***Key Differences***

1. The Foundation’s consumer research tested perception and comprehension of nutrition information in the proposed NFP format. The FDA consumer research will use the current NFP format.
2. The Foundation’s consumer research tested NFP formats with and without a declaration for “Added Sugars.” The FDA consumer research will test “Nutrition Profiles for Experimental Conditions Related to Added Sugars” in NFP versions that only have a declaration for “Added Sugars.”
  - a. The Foundation tested three different NFP versions (all in the proposed format) which are listed below:
    - i. NFP (S) showing only a “Sugars” line (n = 352)
    - ii. NFP (S+A) showing a “Sugars” line with a declaration for “Added Sugars” (n = 356)
    - iii. NFP (TS+A) showing a “Total Sugars” line with a declaration for “Added Sugars” (n = 380)

| <i>Label seen first...</i> | CELL 1<br>Version S | CELL 2<br>Version S + A | CELL 3<br>Version TS + A | TOTAL |
|----------------------------|---------------------|-------------------------|--------------------------|-------|
| Sample Size                | 352                 | 356                     | 380                      | 1088  |

- b. The statistical survey was a monadic design with three independent cells. Participants in each test cell saw and evaluated one of the NFP versions in first position prior to being exposed to the other two options.
  - i. Within each cell, we rotated NFPs for three different products, so a similar number of consumers in each cell were exposed to the panels sequence for:
    1. Cereal (n = 364)
    2. Yogurt (n = 367)
    3. Frozen Meal (n = 357)

| <i>Product type seen</i> | Cereal | Yogurt | Frozen Meal | TOTAL |
|--------------------------|--------|--------|-------------|-------|
| Sample Size              | 364    | 367    | 357         | 1088  |

- c. This key difference gives the Foundation's research the ability to examine differences in label comprehension between NFP versions with and without an "Added Sugars" declaration.
3. The Foundation's research offered consumers the opportunity to respond to open-ended questions in their own words to key questions about:
  - a. Perception of what they think Added Sugars are;
  - b. What the "Added Sugars" line on the NFP means to them;
  - c. How sugars in the "Added Sugars" line might be different from other sugars;
  - d. How they determined the total amount of sugars in a product from the information presented to them on the NFP.

### ***Key Similarities***

1. The Foundation's consumer research showed NFPs (to consumers) that contained the identical product nutrition profiles that the FDA research will utilize.
  - a. The corresponding FDA labels that the Foundation research tested were Cereal 3, Yogurt 3 and Frozen Meal 2.
2. The Foundation's and FDA's consumer research both ask consumers to identify the total amount of sugars perceived to be in a product based on the NFP presented.
3. The Foundation's research asked many of the same questions that FDA will pose to consumers.

### **IFIC Foundation Phase 1—Design and Key Qualitative Findings**

In the [Federal Register published on Monday, March 3, 2014](#), FDA stated, “Policy makers and educators can use focus groups findings to test and refine their ideas, but should then conduct further research before making important decisions such as adopting new policies and allocating or redirecting significant resources to support these policies.”

Before conducting a quantitative survey, the Foundation explored consumer understanding through qualitative research by individually interviewing (30 minutes each) a total of 27 Americans in three different markets across the country (Los Angeles, Baltimore and Atlanta). We chose individual interviews (as opposed to groups) to assess perception, understanding and personal use of nutrition information and labels in a more intimate way—something that focus groups may not always provide when group dynamics are involved. The purpose of this phase was to inform the construction of our quantitative survey with the intention of validating our qualitative findings.

During our qualitative phase, we presented consumers with a variety of current and proposed label versions and formats. In addition to the bolded calorie information, consumers took notice of the new “Added Sugars” line. In our sample, consumers were challenged with perceptions and interpretations associated with the term “Added Sugars.”

Given the increased attention to sugars, it’s not surprising that the term “Added sugars” connotes a less desirable or less healthful product in the minds of some consumers. What was illuminating, however, was the varying degree of consumer perceptions of what constitutes added sugars.

- Some believe added sugars to be plain table sugar.
- Some believe that added sugars are extra sugars that have been newly introduced to alter the composition of an original product.
- Others believe added sugars could even encompass low-calorie sweeteners.

Along with general misunderstanding of the term “Added sugars,” our sample also struggled in identifying absolute amounts of sugars in products from the NFPs presented. These challenges observed in the qualitative phase were examined in more depth during the quantitative phase and are reported on below.

### **IFIC Foundation Phase 2—Key Quantitative Findings**

#### ***NFP comprehension of total sugars content significantly varies between NFP versions with and without added sugars information***

The proposed FDA rule states, “Considering current science and recommendations related to added sugars, we are also proposing to require the declaration of “added sugars,” that will provide consumers with information they need to implement the dietary recommendations of the Dietary Guidelines for Americans, 2010 (2010 DGA).”

The IFIC Foundation supports providing information to consumers that informs their ability to make healthful diet and lifestyle choices. The Foundation also understands and supports the need for increased adherence to the Dietary Guidelines for Americans.

A key question to answer in our consumer research was whether or not an “Added Sugars” declaration on the NFP provides clear information that is well understood by consumers and will be used appropriately in efforts to improve health through informed dietary choices.

***The ability for consumers to accurately identify the total amount of sugars in a product is significantly higher when an “Added Sugars” line is not presented on the NFP.***

Our initial results illustrate significant differences in comprehension between NFP versions with and without an “Added Sugars” declaration. Accurate determination of total sugars content in a product was:

- Highest (92%) when shown an NFP with only a “Sugars” line (S). *\*This was significant versus the other two NFP versions (S+A and TS+A).*
- Lowest (55%) when shown an NFP with a “Sugars” line and an “Added Sugars” line (S+A).
- 66% when shown an NFP version with a “Total Sugars” line and an “Added Sugars” line (TS+A). *\*This was significant versus the S+A version.*

***Consumer understanding that the sugars in an “Added Sugars” line would be included in a “Sugars” line or “Total Sugars” line was significantly higher on NFPs with a “Total Sugars” line.***

The FDA has stated that they “are considering using the term ‘total sugars’ in lieu of ‘sugars’ on the Nutrition Facts label if ‘added sugar’ declaration is finalized, as proposed. FDA plans to conduct consumer testing of the terms ‘total sugars’ and ‘sugars’ on the Nutrition Facts label (FR 2013–12824) to determine if use of the term ‘total sugars’ aids consumers in understanding that added sugars are part of the total amount of sugars in product.”

To confirm how consumers interpret an “Added Sugars” declaration when determining the total amount of sugars in a product, we asked directly if the sugars in the “Added Sugars” line were added to or included in the “Sugars” line or “Total Sugars” line for those two NFP versions (S+A and TS+A). These answers are consistent with the correct determination of total sugars content:

- Over half (52%) believe that the amount in the “Added Sugars” line is added to the amount in the “Sugars” line. *\*This was significant versus the TS+A NFP version.*
  - 37% believe the amount in the “Added Sugars” line is included in the amount in the “Sugars” line.
- One third (33%) believe that the amount in the “Added Sugars” line is added to the amount in the “Total Sugars” line.
  - Over half (52%) believe the amount in the “Added Sugars” line is included in the amount in the “Total Sugars” line. *\*This was significant versus the S+A version.*

***Most consumers perceive that products with an “Added Sugars” declaration have a higher sugars content than is actually present. This misperception affects purchasing behavior.***

Given our observations during the qualitative phase, these quantitative results are not surprising. The perception of sugars content in a product is a critical factor in consumer purchasing behavior. Our research suggests that impact of perceptions of sugars content on purchasing behavior may not be limited to any one particular food category. Although we did not test impact on consumption, it is possible that perceived higher sugars content may prompt consumers to avoid energy-dense *and* nutrient-dense foods.

When we showed consumers three NFP versions (S, S+A and TS+A) of a product (cereal, yogurt or frozen meal) with each NFP having identical nutritional profiles and asked them which NFP version they would purchase first, more than 3 in 4 (76%) chose the S version.

As a follow up question, we asked “if you wanted to buy the product that has the least amount of sugars based on this label, which one would you select?” Consistently, the NFP version with only a “Sugars” line (S) was selected.

- Regardless of the NFP version seen first, about 6 in 10 believe there is a difference in sugars content between the three NFP versions presented.
  - *\*Reminder that the 3 NFP versions presented to each individual contained the same amount of sugars.*
- About one-third (34%) see all three NFP versions as having the same amount of sugars.

***There is confusion among consumers regarding what added sugars are.***

Both phases of our research revealed consumers lack understanding about what is considered to be an added sugar. This is a key concept consumers would need to comprehend to determine what the “Added Sugars” declaration means in terms of a product’s composition and nutrition profile. Despite this confusion, consumers believe the mere presence of an “Added Sugars” line suggests a differentiation between those types of sugars and the types included in the “Sugars” or “Total Sugars” line. One survey participant stated:

“I assume they must be different from regular sugars used in the manufacturing. Since it must be required on the label to differentiate between them, I assume they are artificial type sugars.”

In fact, more than half of consumers (56.3%) believe sugars in the “Added Sugars” line differ from those in the “Sugars” or “Total Sugars” line, while one in five (20.0%) do not know. Those who believe “Added Sugars” are different from “Sugars” think they are just that – added beyond the natural ingredients in the product (31%), not natural (15%), or different kinds of sugars added for some purpose (7%).

While many consumers believe added sugars are in some way different, perceptions vary widely on the definition of the types of sugars that would be in the “Added Sugars” line. In the qualitative phase, when asked to give examples of what might be an added sugar, interviewees provided many different answers, such as more of the same type of sugars inherent in the product, additional white granulated

sugar, additional sweeteners, low-calorie sweeteners, and sugar alcohols. In the quantitative phase, survey participants were given an open-ended response to describe what “Added Sugars” means. Similarly, a wide array of responses were provided, but one in five simply did not know how to describe added sugars:

| <b><i>“Added Sugars” means...</i></b>               | <b><i>Total Sample</i></b> |
|---|----------------------------|
| Added (More, extra, added to Total line)            | 34%                        |
| Other Than Natural                                  | 28%                        |
| Don’t know / no answer                              | 19%                        |
| Reason / Purpose (additional flavor, add sweetness) | 7%                         |
| Other   | 14%                        |

Survey participants were also given a list of various sweeteners and asked which would be included in the “Added Sugars” line in the NFP. As noted previously, some consumers incorrectly offered low-calorie sweeteners and sugar alcohols as examples of added sugars. Overall, sweeteners such as sucralose, saccharin and stevia are less likely to be considered sugars but equally likely to be considered added sugars. Approximately 7 in 10 consumers incorrectly believe low-calorie sweeteners would be included in the “Added Sugars” line or do not know.

Given these knowledge gaps identified by our research, it will be important for communications regarding the NFP and an “Added Sugars” declaration to have a consistent definition of added sugars and what ingredients would be included.

***The relationship between added sugars and calories is not clearly understood by consumers.***

The proposed FDA rule states, “[W]e are proposing to require the declaration of added sugars on the Nutrition Facts label to provide consumers with information that is necessary to meet the dietary recommendation to reduce caloric intake from solid fats and added sugars.” One objective of our research was to explore consumer knowledge and behavior regarding added sugars and calories and their ability to compare labels. Qualitative participants were asked to select a product based on two proposed labels which were identical except for the Calories, Total Carbohydrates, and Added Sugars section of the labels: 1) lower Calories and Total Carbohydrates and higher Added Sugars, and 2) higher Calories and Total Carbohydrates and lower Added Sugars. Most gravitated quickly to the lower Calorie / lower Carb option, even though the Added Sugars were greater. On balance, consumers did not use the information to lower their intake of added sugars as recommended, but made the decision based on the lower Calories. This finding indicates the label may already have the most relevant information (total calories) for consumers to make their food and beverage decisions.

While consumers tend to give more weight to calories and total carbs than added sugars in their food and beverage decisions, a knowledge gap was clearly observed among most consumers about the caloric contribution of added sugars compared to other types of sugars. Though a sizeable minority of consumers (42.6%) correctly believe added sugars have the same calories as other sugars, the majority of consumers do not know this. To the contrary, nearly one in four (23.6%) believe added sugars have more calories than other sugars, while another 29.9% do not know. Consumers were even further confused when asked whether added sugars have the same amount of calories as carbs. Only 38.4% agreed, while 24.4% incorrectly believe the amount of calories in added sugars differs from carbohydrates and 37.1% do not know.

FDA also states that “neither the 2010 DGA nor the IOM macronutrient report concluded that added sugars consumption from all dietary sources, in itself, increases obesity. In fact, the 2010 DGA states that added sugars do not contribute to weight gain more than any other source of calories.” Our research shows most consumers also recognize this and do not believe added sugars differ from other sugars in terms of their effects on weight. Nearly three-fourths of consumers (74.4%) agree added sugars contribute to weight gain and obesity the same as other types of sugars.

With the increasing prominence of calories on the proposed label, it will be important for consumers to understand the relationship between the carbohydrates, added sugars, and calories.

***Consistent, coordinated communication efforts will be needed to educate consumers about the NFP and added sugars.***

According to the proposed rule, FDA “acknowledge[s] that, if finalized, a requirement for declaration of sugars on the Nutrition Facts label will need to be accompanied by consumer education on the role of added sugars, along with solid fats, and the use of the new information on the label in overall dietary planning.” It is evident from IFIC Foundation research that substantial knowledge gaps about added sugars currently exist among consumers.

- There is confusion over what added sugars are, what ingredients would be considered added sugars, and how they differ from other types of sugars.
- Over half of consumers (55.7%) either believe “Added Sugars” would be in addition to the amount shown in the “Sugars” or “Total Sugars” line or do not know.
- Over half of consumers (57.4%) do not understand that added sugars contribute the same amount of calories as other types of sugars
- Less than 1 in 3 consumers (32.4%) understand sugars are carbohydrates.

It is critical to address these knowledge gaps in order for consumers to correctly interpret and use the “Sugars” declaration to make informed dietary choices. One survey participant noted, “Labels should inform, and not confuse the consumer.” Our research illustrates that the “Added Sugars” declaration may not provide the intended clarity, rather it may only add complexity to a subject that is already poorly understood. When combined with the fact that FDA has stated that they “continue to recognize the lack of a physiological distinction between added and naturally occurring sugars,” this aspect of the proposal has a high risk of misinforming and misleading consumers as to the total



amount of sugars in a food product. In order to inform and not confuse, consistent, science-based information from FDA and other stakeholders in the food and nutrition environment will be necessary to ensure the proposed NFP updates are clear and comprehensible to consumers. FDA is correct that an investment in education is essential; however, our results suggest it would be more productive to invest educational resources in a better understanding of the total amount of sugars rather than to combat any misleading understanding or confusion due to a declaration of “Added Sugars.”

### **Conclusion/Summary of Key Points**

In summary, consumer understanding of “Added Sugars” in Nutrition Facts is limited. Our preliminary findings demonstrate the need for FDA (and other authoritative bodies such as the 2015 DGAC) to more broadly consider the implications of consumer research, specifically on the proposed inclusion of “Added Sugars” to the NFP. Additional consumer research is essential to determine a format to provide this type of information in a manner that is not misleading or confusing, but is informative and ensures appropriate use in making informed dietary choices.

IFIC Foundation will be submitting the results of our two-phase research to a peer-reviewed journal for publication. We ask the 2015 DGAC to consider the following key findings in context of the public health impact when finalizing their Draft Implications Statement regarding an “Added Sugars” declaration on the NFP:

- The varied and conflicting interpretation of NFP information that we’ve encountered is a great reminder of the critical role that consumer research and testing must play prior to the implementation of proposed label changes.
- NFP comprehension of total sugars content significantly varies between NFP versions with and without added sugars information.
- The ability for consumers to accurately identify the total amount of sugars in a product is significantly higher when an “Added Sugars” line is not presented on the NFP.
- Consumer understanding that the sugars in an “Added Sugars” line would be included in a “Sugars” line or “Total Sugars” line was significantly higher on NFPs with a “Total Sugars” line.
- Most consumers perceive that products with an “Added Sugars” declaration have a higher sugars content than is actually present. This misperception affects purchasing behavior.
- There is confusion among consumers regarding what added sugars are.
- The relationship between added sugars and calories is not clearly understood by consumers.
- Large-scale, consistent, and coordinated communication efforts will be needed to educate consumers about the NFP and added sugars.

We are hopeful the above results from our consumer research are informative to the DGAC in their continued deliberations.

Sincerely,

A handwritten signature in black ink, reading "Marianne Smith Edge". The signature is fluid and cursive, with the first name "Marianne" being the most prominent.

Marianne Smith Edge, MS, RD, LD, FADA  
Senior Vice President, Nutrition & Food Safety  
International Food Information Council (IFIC) and Foundation